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5 *Attorneys for Plaintiff Kelly Pinn, on her own behalf,  
and on behalf of all others similarly situated*

6 **UNITED STATES DISTRICT COURT**  
7 **NORTHERN DISTRICT OF CALIFORNIA**

8 KELLY PINN, an individual, on her own  
9 behalf and on behalf of all others similarly  
situated,

10 Plaintiffs,

11 v.  
12 CONSUMER CREDIT COUNSELING  
13 FOUNDATION, INC., NATIONAL  
14 BUDGET PLANNERS OF SOUTH  
FLORIDA, INC., Florida corporations, and  
15 ISHWINDER JUDGE, an individual,  
and DOES 1-10, inclusive,

16 Defendants.

**DECLARATION SUPPORTING  
PLAINTIFF KELLY PINN'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED**

No. 4:22-cv-04048-DMR

Judge Donna M. Ryu

17 1. My name is Ethan Preston. I am an attorney at law licensed to practice before all  
18 of the courts of the State of California. I am counsel of record for Plaintiff Kelly Pinn ("Pinn"),  
19 and have personal knowledge of all of the facts set forth in this declaration and could testify  
20 thereto if called to do so.

21 2. Plaintiff's motion to sanction incorporates the deposition of Porus Engineer and,  
22 e.g., exhibits 31, 33, 34, and 35 to the Engineer deposition to identify irreconcilable  
23 discrepancies between CCCF's payroll records and the employee incentive policies that  
24 Defendants have provided Plaintiff. Defendants have designated exhibits 31, 33, 34, and 35 and  
25 related portions of the Engineer deposition as confidential under the stipulated protective order.  
(ECF No. 32.)

26 3. Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury under the laws of  
27 the United States of America that the foregoing is true and correct.

1 Dated: August 7, 2024  
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3 By: \_\_\_\_\_ s/Ethan Preston  
4 Ethan Preston  
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